

**IN THE UNITED STATES BANKRUPTCY COURT
NORTHERN DISTRICT OF OHIO**

IN RE: LOUIS JONES, JR.

)

CASE NO. 21-40537
CHAPTER 7

)

DEBTOR

)

JUDGE TIIARA N.A. PATTON

**REPLY TO THE RESPONSE OF MOTION TO COMPROMISE
AND APPLICATION FOR COMEPNSATION**

Now comes Richard G. Zellers, Trustee, by and through Counsel, and herein files its Reply to the Response to Motion to Compromise and Application for Compensation as filed by the Mahoning County Child Support Enforcement Agency ("Agency") and states as follows.

The Agency is absolutely correct in its analysis that administrative expenses are to be paid prior to any other priority or unsecured claims. This is black letter law and it is apparently understood by the Agency in reading their response. It appears, what they want is for the Trustee to state what the administrative expenses are in the case at this point in time.

This is not the time to indicate what the administrative expenses will be due to the fact that there continues to be required work and action by Richard G. Zellers, the attorney for the Trustee, such as responding to this Response. Additionally, there will need to be a CPA hired to file the tax return, as a portion of the recovery is in fact attributed to wages.

The administrative expenses continue to rise by the fact that the Agency's client filed a frivolous pleading in the Mahoning County Domestic Relations Court trying to hold

up the settlement. The settlement has been held up until an Order of this Bankruptcy Court authorizes the compromise, thus, there is a slight chance there will be no monies to talk about whatsoever.

The Agency needs to be patient and await the conclusion of the settlement process in the District Court and in this Court, the preparation and filing of tax returns, and anything else that comes up requiring additional attorney fees in this matter.

Respectfully submitted,

/s/Richard G. Zellers

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CERTIFICATE OF SERVICE

I certify that on January 5, 2023 a true and correct copy of the foregoing notice was served:

Via the Court's Electronic Case Filing System on these entitles and individuals who are listed on the Court's Electronic Mail Notice List:

Joshua Baumann, Joshua.Baumann@JFS.Ohio.gov

And by regular U.S. Mail, postage prepaid, on:

Office of the United States Trustee
201 Superior Ave., Room 441
Cleveland, OH 44114